

98-160

July 30, 1998

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Lester Snow, Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 115 5  
Sacramento, CA 95914

Subject: DRAFT, Developing a Draft Preferred Project Alternative

Dear Mr. Snow:

Robert W. Puddicombe  
Chairman

Joseph P. Centeno  
Vice Chairman

Dan Masnada  
Executive Director

Stanley C. Hatch  
General Counsel

*Member Agencies*

City of Buellton

Carpinteria Valley  
Water District

City of Guadalupe

City of Santa Barbara

City of Santa Maria

Goleta Water District

Montecito Water District

Santa Ynez River Water  
Conservation District,  
Improvement District #1

*Associate Member*

La Cumbre Mutual  
Water Company

I am a member of the State Water Contractors (SWC) Board of Directors. I agree with and incorporate by reference the contents of the 7/31/98 SWC letter to you regarding the referenced document.

CCWA strongly supports a phased implementation approach. Our principal concern is the "negative presumption" set forth in the paper regarding the dual conveyance alternative with an isolated facility (page 6, discussion of "Contingency strategy"). As we understand the strategy, Alternative 2 is presumed to be able to meet the water quality and fishery goals and Alternative 3 will only be re-considered if implementation of Alternative 2 does not succeed in meeting the goals.

CCWA sees no compelling technical reasons to support such a positive expectation for potential water quality and fishery benefits arising from implementing Alternative 2. We believe that a fundamental change is needed in the approach to developing a preferred alternative under the staged approach. For Stage 1, a neutral position with regard to Delta conveyance facility options needs to be taken while further evaluations of water quality and fisheries are conducted. Required feasibility and environmental permitting studies should be conducted on all options including an isolated facility to minimize delays in implementation once the final decision has been made.

In addition to concerns regarding the "contingency strategy," we believe that the Stage 1 monitoring program should be more "real time" in nature, allowing for even greater flexibility in providing fishery and water supply protections than allowed in practice under the 1994 Bay-Delta Accord. There also needs to be closer and better-defined linkages between the ecosystem restoration and water quality and water supply elements of the staged plan. This is needed to ensure to all parties that CALFED's program is being implemented in an equitable manner beginning in Stage 1 and continuing through full implementation.

The SWC has asked to meet with you in the near future to discuss its concerns in further detail. I urge that you meet with the SWC and give serious consideration to the issues it has raised.

Sincerely,

Dan Masnada  
Executive Director

SM/lfn

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